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**From:** Orrick, Greg [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=446E62FAE2404D99ADFBF06B5E5DB371-GREG ORRICK]  
**Sent:** 4/5/2022 9:14:26 PM  
**To:** Wentte, Stephen [Wentte.Stephen@epa.gov]  
**Subject:** RE: PFAS and broflanilide

Yes, that's consistent with the current definition.

We don't know the rates at which the side-chain is cleaved into any non-PFAS degradates, however. And I suspect the Agency may modify the PFAS definition at a faster rate than any new degradation rate studies that radiolabel the PFAS moiety can be conducted.

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**From:** Wentte, Stephen <Wentte.Stephen@epa.gov>  
**Sent:** Tuesday, April 5, 2022 5:01 PM  
**To:** Orrick, Greg <Orrick.Greg@epa.gov>  
**Subject:** RE: PFAS and broflanilide

Would you agree that by that definition, if the side-chain broke off and became its own molecule of  $\text{CF}_3\text{-CF(H)-CF}_3$ , then it **would not** be a PFAS? However, if it broke off and became  $\text{CF}_3\text{-CF(OH)-CF}_3$ , then it **would** be a PFAS?

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**From:** Orrick, Greg <Orrick.Greg@epa.gov>  
**Sent:** Tuesday, April 5, 2022 4:51 PM  
**To:** Wentte, Stephen <Wentte.Stephen@epa.gov>  
**Subject:** FW: PFAS and broflanilide

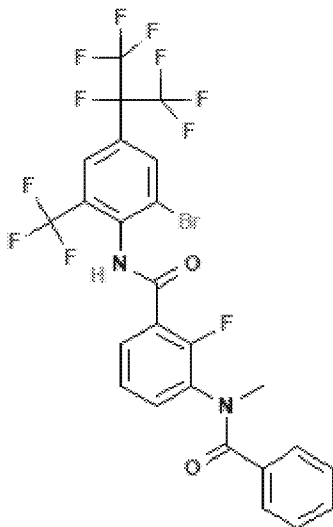
FYI

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**From:** Leifer, Kerry <Leifer.Kerry@epa.gov>  
**Sent:** Monday, March 28, 2022 4:02 PM  
**To:** Khan, Faruque <Khan.Faruque@epa.gov>  
**Cc:** Sankula, Sujatha <Sankula.Sujatha@epa.gov>; Orrick, Greg <Orrick.Greg@epa.gov>; Farruggia, Frank <Farruggia.Frank@epa.gov>  
**Subject:** RE: PFAS and broflanilide

Hi Faruque,

The definition that we (OPP) are using is the OPPT PFAS working definition for TSCA purposes ( **$\text{CF}_2\text{R-CFR'R'}$  where R, R', R' do not equal H**). Broflanilide *does* meet this definition of a PFAS as it contains a  $\text{CF}_3\text{-CF(R)-CF}_3$  moiety (see structure below).



Hope this helps, please let me know if you have any questions

Kerry Leifer, Chief (he/him)  
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**From:** Khan, Faruque <[Khan.Faruque@epa.gov](mailto:Khan.Faruque@epa.gov)>  
**Sent:** Monday, March 28, 2022 3:47 PM  
**To:** Leifer, Kerry <[Leifer.Kerry@epa.gov](mailto:Leifer.Kerry@epa.gov)>  
**Cc:** Sankula, Sujatha <[Sankula.Sujatha@epa.gov](mailto:Sankula.Sujatha@epa.gov)>; Orrick, Greg <[Orrick.Greg@epa.gov](mailto:Orrick.Greg@epa.gov)>; Farruggia, Frank <[Farruggia.Frank@epa.gov](mailto:Farruggia.Frank@epa.gov)>  
**Subject:** PFAS and broflanilide

Hi Kerry,  
 Good afternoon. We are planning to meet with RD folks regarding PFAS future briefing related to PQZ and broflanilide next week. I am working on broflanilide in the EFED. I was told that you may have information related PFAS related pesticides. We are interested in finding whether broflanilide is classified as PFAS.  
 I would appreciate if you have any relevant info related to broflanilide and PFAS to share with us.  
 Thank you in advance for your help!  
 Faruque

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